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Attorneys for Defendant

# IN THE UNITED STATES DISTRICT COURT

### DISTRICT OF OREGON

## PORTLAND DIVISION

A-DEC, INC., an Oregon corporation,

Case No. 3:20-cv-01679-AC

PLAINTIFF,

STIPULATED MOTION TO STAY CASE

ILAINTIFF,

v.

W&H DENTALWERK BÜRMOOS GES. M.B.H., an Austrian private limited liability company,

DEFENDANT.

## LR 7-1 CERTIFICATE OF COMPLIANCE

Pursuant to LR 7-1, the parties certify that they conferred in good faith and stipulate to the relief sought in this motion.

### **MOTION**

The parties have reached an agreement in principle to arbitrate this dispute privately, but require additional time to memorialize this agreement. The parties accordingly request that all case deadlines, including defendant's deadline to respond to the First Amended Complaint, be stayed. The parties anticipate filing a further update with the court within two weeks.

4846-6302-8187v.2 0116782-000001

This motion is made in good faith and not for purposes of delay, and without waiver of or prejudice to any defense, including but not limited to any that may be raised in a responsive pleading or motion under Fed. R. Civ. P. 12.

STIPULATED AND AGREED on February 9, 2021:

By:

#### **HOLLAND & KNIGHT LLP**

## s/ Shannon Armstrong

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